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Before the

FEDERAL COMMUNICATIONS COMMISSION

WASHINGTON, DC 20554

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In the Matter of)
The Land Mobile Communications Council's (LMCC))
PETITION FOR RULEMAKING) RM-9267
Request for the Immediate Reallocation of)
420 to 430 MHz. and 440 to 450 MHz.)
From the Federal Government to the)
Private Mobile Radio Service (PMRS) on a Primary Basis.)

To: The Chief, Public Safety and Private Wireless Division

Wireless Telecommunications Bureau

OBJECTION TO

REQUEST FOR FREQUENCY REALLOCATION

420 to 430 MHz. and 440 to 450 MHz.

William W. Winstead (KJ4SO)

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May 9, 1998

Dear Commissioners:

I am writing this letter to respectfully request that you deny the LMCC's request for reallocation

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of the 420 to 430 MHz. and 440 to 450 MHz. from the federal government to the Private Mobile Radio Service (PMRS) on a primary basis. Amateur Radio now enjoys the use of 420 to 450 MHz on a secondary basis, and the 430 to 440 MHz segment is an international allocation.

I am an electronics engineer with 30 years experience in Telecommunications and I have been a licensed Amateur Radio operator for approximately 24 years.

The 70-cm band is the second most popular VHF/UHF Amateur Radio band. It has substantial FM repeater, Packet radio, and radio control link operations in the 440 to 450 MHz segment. This band is **absolutely essential** for FM repeater operations which are heavily used for emergency communications and public service operations, especially ARES and SkyWarn operations.

Thousands of U.S. Amateur Radio operators have made a significant personal financial investment in equipment for the 70cm band and also provide major contributions of their time in the support of ARES and SkyWarn as well as other public service operations. These activities would be severely crippled if Amateur Radio lost its use of these frequencies.

The 70 cm band is the lowest Amateur frequency that high speed packet radio and ATV are permitted. Due to bandwidth limitations, these types of communications would only be possible on the microwave bands if Amateurs were to loose the 70cm band. Due to propagation conditions and path loss considerations at microwave frequencies these modes of operation would be severely impacted.

The 420 to 430 MHz segment is heavily used for Amateur Television (ATV) repeaters. It is the only allocation below 900 MHz. for this mode of operation. It would be impossible to share

these frequencies with the LMRS.

I am the president of the Triangle ATV Association. We own and operate an ATV repeater in Durham, NC which has its output on 421.25 MHz. We have more than \$5,000 and 5 years of time invested in this system. Compared to commercial and government communications systems, \$5,000 probably seems very small to you, but I can assure you that it is very significant to Amateur Radio operators when you are speaking about a personal investment. We are in the process of raising an additional \$5,000 so that we can add a second linked system to be located in Raleigh, NC to provide enhanced ATV coverage for this area. Reallocation of the 420 to 430 MHz segment would destroy our investment in this system. This would impose a severe penalty on all ATV operators across the country.

The 70cm ATV frequencies provide for the easy and inexpensive introduction of ATV to Amateur Radio operators, and non-licensed experimenters as well, because of the ability to use "Cable Ready" TV sets and VCRs for ATV receivers since the ATV channels of 421.25 and 428.25 MHz. correspond to Cable channels 57 and 58. If the 420 to 430 MHz segment is lost, it would severely impact many Amateur Radio operators who have invested significant money and time in ATV. It would put ATV operation out of reach to many people who could not afford the much more expensive equipment required for operation at 903 MHz and above.

The LMCC has acknowledged Amateur Radio's value and record of service. Rather than proposing total elimination of Amateur Radio in the selected spectrum, they propose sharing the band, with Amateur Radio taking a secondary, non-interfering position. However, they make no suggestions as to how this arrangement might work.

The suggestion that Amateur Radio and the PMRC could share the 70cm band is completely unworkable, and the LMCC's offer to share spectrum should not tip the balance of this request in their favor.

Amateur Radio is currently secondary to the US Government in the 420-450 MHz band. Here in the North Carolina, the government's principle use of the spectrum is for RADAR. Amateur signals do not disrupt the RADAR operation at all, and while the RADAR signals do occasionally disrupt Amateur communications, the effect is minor and we have co-existed with very few problems for many years.

In the 440-450 MHz band, most Amateur communication, as well as most PMRC communication, would use the same mode: narrow band FM. In major metropolitan areas, each PMRC system placed on the air would surely displace an Amateur system. Thousands of Amateur 70cm repeaters across the country would be eliminated.

In the 420-430 MHz segment, Amateur Radio is primarily Amateur Fast Scan Television, and any PMRC signals appearing in that spectrum would make Amateur TV completely unusable.

The LMCC suggests the possibility of making some spectrum available to Amateurs in the 1400 MHz area. While we appreciate the thought, it would be a very unfair trade. The LMCC points out that their own need for 450 MHz spectrum is based on immediate equipment availability. They say they could use existing equipment at 450 MHz, while hardware at 1400 MHz and above has not been developed to suit their needs.

Meanwhile, thousands of Amateurs would be left with useless UHF equipment that was purchased with personal funds. There is no equipment available to suit Amateur needs in the

1400 MHz area, either. The large PMRC market is much more likely to spur hardware development for those frequencies than the Amateur market could ever provide.

Conclusion:


The LMCC has demanded the immediate reassignment of the 70cm band to them as primary users. This would impose a heavy financial burden on thousands of Amateur Radio operators and would cripple emergency and public service operations across the country. In addition, it would seriously impact the growth of Amateur radio.

Please consider the track record of Amateur Radio's contribution to emergency communications across the country during the many tornadoes, floods, hurricanes, and other disasters that our country has experienced during the past many years. Future emergency communications operations would be crippled if the LMCC's demands for the 70cm band are granted.

Therefore, I respectfully urge the Commission to deny the LMCC's request to reallocate the Government/Amateur Radio spectrum between 420-450 MHz.

Thank you for considering my comments in making your decision. I would like to further request that you consider making Amateur Radio the Primary and sole user for any and all portions of the 70cm Amateur Radio band, if and when such portions are abandoned by the U.S. Government.

Sincerely,


William W. Winstead
KJ4SO